

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

ALBIN MELI;
CHARLIE MELI;
JEREMIE MELI;

PLAINTIFFS

vs.

CITY OF BURLINGTON, VERMONT;

Civil Action
No. 2:19-CV-71

BRANDON DEL POZO,
INDIVIDUALLY AND IN HIS OFFICIAL
CAPACITY AS CHIEF OF POLICE FOR
THE CITY OF BURLINGTON, VERMONT;

JASON BELLAVANCE,
INDIVIDUALLY AND IN HIS OFFICIAL
CAPACITY AS A POLICE OFFICER FOR
THE CITY OF BURLINGTON, VERMONT;

CORY CAMPBELL,
INDIVIDUALLY AND IN HIS OFFICIAL
CAPACITY AS A POLICE OFFICER FOR
THE CITY OF BURLINGTON, VERMONT;

DEFENDANTS

DISCOVERY STIPULATION AND CONFIDENTIALITY AGREEMENT

NOW COMES Evan Chadwick, Esq., attorney for the above named Plaintiffs, and Pietro Lynn, Esq., attorney for the above named Defendants, and STIPULATE AND AGREE to the following:

No later than March 1, 2020, Plaintiff's Counsel shall provide to Defendant's Counsel, Plaintiff's expert Dr. Tina Trudell's raw data that shall include Dr. Trudell's notes, billing materials, scoring summaries, interpretive reports and testing materials generated in connection with her evaluation of Plaintiff, Jeremie Meli. The parties agree that all raw data provided by Dr. Trudell shall remain strictly confidential. Defendants Counsel shall not copy, transmit, disseminate or distribute in any fashion the raw data provided by Dr. Trudell to any third parties without the implied consent of Plaintiffs' Counsel. Defense Counsel further agrees to destroy all raw data provided by Dr. Trudell at the conclusion of the case.

No later than April 1, 2020, Defendants shall depose Plaintiff, Jeremie Meli and Plaintiff's expert, Dr. Tina Trudell.

No later than May 1, 2020, the parties shall participate in mediation with Attorney Michael Marks.

The parties agree to stay all further discovery until after mediation has been completed.

If the parties do not resolve the case at mediation the parties shall, within 30 days of mediation, enter into a revised Discovery Stipulation and Order or should new discovery deadlines not be agreed to, jointly move for the Court to schedule a Discovery Conference forthwith.

DATED at Brattleboro, Vermont this 3rd day of February, 2020.

Respectfully submitted,
Attorney for Plaintiffs

S/Evan Chadwick
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DATED at Burlington, Vermont this 3rd day of February, 2020.

Respectfully submitted,
Attorney for Defendants

S/ Pietro Lynn
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SO ORDERED:

/s/ William K. Sessions III
Judge

February 14, 2020
Date